

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|------------------------------|---|--------------------------|
| TERRENCE J. HANCOCK, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | CIVIL ACTION |
| vs. |) | |
| |) | NO. 18 C 4005 |
| T CAT ENTERPRISE, INC., |) | |
| an Illinois corporation, |) | JUDGE JOHN J. THARP, JR. |
| |) | |
| Defendant. |) | |

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, T CAT ENTERPRISE, INC., an Illinois corporation, in the total amount of \$316,744.73, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,997.50.

On August 22, 2018, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to the Illinois Secretary of State) (a copy of the Summons and Affidavit of Compliance for Service on Secretary of State form is attached hereto). Therefore, Defendant's answer was due on September 12, 2018. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 9th day of October 2018:

Dana J. Trumbull, Registered Agent
T Cat Enterprise, Inc.
9300 Franklin Avenue
Franklin Park, IL 60131-2831

Mr. James Trumbull, President
T Cat Enterprise, Inc.
997 Reading Drive
Bartlett, IL 60103-4558

Mr. James Trumbull, President
T Cat Enterprise, Inc.
PO Box 657
Franklin Park, IL 60131-0657

Office of the Secretary of State
Department of Business Services
Annual Reports/Registered Agent Section
501 S. 2nd Street, Room 350
Springfield, IL 62756-1000

/s/ Laura M. Finnegan

Laura M. Finnegan
Attorney for the Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6210637
Telephone: (312) 216-2563
Facsimile: (312) 236-0241
E-Mail: lmfinnegan@baumsigman.com